

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

APPLE INC.

Plaintiff,

Case No.: 1:08-cv-0597

v.

NICHOLAS WOODHAMS,

Honorable Janet T. Neff
U.S. District Judge

Defendant.

Larry J. Saylor (P28165)
Matthew F. Leitman (P48999)
Kurt P. McCamman (P51477)
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**STIPULATED ORDER TEMPORARILY STAYING ACTION IN LIGHT
OF PARALLEL CRIMINAL INVESTIGATION**

STIPULATION

Plaintiff Apple Inc. and Defendant Nicholas Woodhams, through undersigned counsel, stipulate as follows:

Many of the primary allegations in the Complaint filed by Plaintiff Apple Inc. ("Apple") against Defendant Nicholas Woodhams substantially overlap with the subject matter of a current and ongoing criminal investigation of Woodhams being conducted under the auspices of the United States Attorney's Office for the Western District of Michigan (the "Investigation"). Given the pendency of the Investigation, the parties stipulate to the entry of a temporary stay of

all proceedings. The parties agree that such a stay is an appropriate means of protecting and preserving Woodhams Fifth Amendment rights and his right to defend himself against Apple's allegations. The parties stipulate to stay all proceedings in this action for 180 days and to re-visit at the expiration of this initial 180-day stay period whether there is a need to extend the stay further.

s/Kurt P. McCamman

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s/with consent Randall S. Levine

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ORDER

At a session of said Court, held in
the Courthouse in Grand Rapids,
Michigan on _____

PRESENT: HONORABLE JANET T. NEFF

This matter having come before the Court on the Stipulation of the parties, IT IS
HEREBY ORDERED THAT all proceedings in this action are stayed for a period of 180 days.
At the expiration of the 180-day period, the parties shall advise the Court if they wish to continue
the stay, and the Court will rule on any request for an extension of the stay at that time.

Dated: _____

JANET T. NEFF
United States District Judge